

**EXHIBIT 1**

**REDACTED VERSION  
OF DOCUMENT  
SOUGHT TO BE SEALED**

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**From:** James Judah <jamesjudah@quinnemanuel.com>  
**Sent:** Thursday, September 21, 2017 4:51 PM  
**To:** Gonzalez, Arturo J.; David Perlson; UberWaymoMoFoAttorneys; BSF\_EXTERNAL\_UberWaymoLit; DG-GP Otto Trucking Waymo; Susman Godfrey (uber-sg@lists.susmangodfrey.com); jpatchen@taylorpatchen.com  
**Cc:** QE-Waymo; 'John Cooper'; 'MCate@fbm.com'  
**Subject:** RE: Waymo v Uber - Request for Depositions and Confirmation of Dates Today  
**Attachments:** UBER00323120.pdf; UBER00323660.pdf

- External Email -

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Arturo, see below:

Ratner, Gruver, Linaval, and M. Levandowski [REDACTED] See, for example, the attached.

Morgan—Our Motion to Continue shows the need for her additional deposition

Suhr—[REDACTED] And he is on Uber's witness list but you never gave us any dates for his deposition.

While not the only bases for needing these depositions, above is certainly sufficient enough to justify them. Please confirm today you will provide these witnesses on the dates listed below.

James

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**From:** Gonzalez, Arturo J. [mailto:AGonzalez@mofo.com]  
**Sent:** Thursday, September 21, 2017 2:24 PM  
**To:** David Perlson <davidperlson@quinnemanuel.com>; UberWaymoMoFoAttorneys <UberWaymoMoFoAttorneys@mofo.com>; BSF\_EXTERNAL\_UberWaymoLit <BSF\_EXTERNAL\_UberWaymoLit@BSFLLP.com>; DG-GP Otto Trucking Waymo <DG-GPOttoTruckingWaymo@goodwinlaw.com>; Susman Godfrey (uber-sg@lists.susmangodfrey.com) <Uber-sg@LISTS.SUSMANGODFREY.COM>; jpatchen@taylorpatchen.com  
**Cc:** QE-Waymo <qewaymo@quinnemanuel.com>; 'John Cooper' <JCooper@fbm.com>; 'MCate@fbm.com' <MCate@fbm.com>  
**Subject:** Waymo v Uber - Request for Depositions and Confirmation of Dates Today

David,

We write to confer regarding your list below. We understand that we will have to produce certain witnesses for deposition and that you had previously reserved time for some of these witnesses. However, there should be an offer of proof with respect to the new names that you added to your list. Specifically, please provide us with your basis for wanted to depose Ratner, Morgan, Suhr, Gruver, Linaval, and M. Levandowski. We will check on availability of the other Uber names on your list that we have not already confirmed.

**ARTURO J. GONZÁLEZ**  
Partner | Morrison & Foerster LLP

425 Market St. | San Francisco, CA 94105

P: +1 (415) 268-7020

[mofo.com](http://mofo.com) | [LinkedIn](#) | [Twitter](#)

**From:** David Perlson [<mailto:davidperlson@quinnemanuel.com>]

**Sent:** Thursday, September 21, 2017 1:15 PM

**To:** UberWaymoMoFoAttorneys; BSF\_EXTERNAL\_UberWaymoLit; DG-GP Otto Trucking Waymo; Susman Godfrey ([uber-sg@lists.susmangodfrey.com](mailto:uber-sg@lists.susmangodfrey.com)); [jpatchen@taylorpatchen.com](mailto:jpatchen@taylorpatchen.com)

**Cc:** QE-Waymo; 'John Cooper'; 'MCate@fbm.com'

**Subject:** RE: Waymo v Uber - Request for Depositions and Confirmation of Dates Today

- External Email -

Jonathan, see below regarding Mr. Ron's deposition. We ask for confirmation of Mr. Ron's deposition in the same timeframe and with the same reservations as below.

David

**From:** David Perlson

**Sent:** Thursday, September 21, 2017 12:44 PM

**To:** UberWaymoMoFoAttorneys <[UberWaymoMoFoAttorneys@mofo.com](mailto:UberWaymoMoFoAttorneys@mofo.com)>; BSF\_EXTERNAL\_UberWaymoLit <[BSF\\_EXTERNAL\\_UberWaymoLit@BSFLLP.com](mailto:BSF_EXTERNAL_UberWaymoLit@BSFLLP.com)>; DG-GP Otto Trucking Waymo <[DG-GPOttoTruckingWaymo@goodwinlaw.com](mailto:DG-GPOttoTruckingWaymo@goodwinlaw.com)>; Susman Godfrey ([uber-sg@lists.susmangodfrey.com](mailto:uber-sg@lists.susmangodfrey.com)) <[Uber-sg@LISTS.SUSMANGODFREY.COM](mailto:Uber-sg@LISTS.SUSMANGODFREY.COM)>

**Cc:** QE-Waymo <[gewaymo@quinnemanuel.com](mailto:gewaymo@quinnemanuel.com)>; 'John Cooper' <[JCooper@fbm.com](mailto:JCooper@fbm.com)>; 'MCate@fbm.com' <[MCate@fbm.com](mailto:MCate@fbm.com)>

**Subject:** Waymo v Uber - Request for Depositions and Confirmation of Dates Today

Counsel, given the Court's directive at the Court's hearing please confirm the following witnesses will be made available on the following dates by close of business today. It is essential that we get prompt confirmation of these depositions, on the listed dates, given the schedule. Obviously, these depositions will be taken without the full production and/or review of a massive number of documents and materials. We reserve our right to seek (and will likely seek) further depositions of these deponents if new documents relevant documents or information comes to our attention and/or after we have had sufficient time to actually review and digest all these materials, which we will not be able to do in the next two weeks. That said, we have set the dates these depositions in a manner to best utilize the massive amount of newly produced materials that continue to be reviewed so we ask these witnesses be provided on these dates. We will be contacting the third parties listed below in parallel as needed. Please note that as we continue to review the materials we will likely be requesting further depositions beyond below.

Juelsgaard	9/26
Ratner	9/26
Kim	9/26
Morgan	9/27
Suhr	9/27
Bentley	9/27
Sebern	9/28
Gruver	9/28

Friedberg 1	9/28
Tate	9/29
Qi	9/29
Gurley	9/29
Linaval	9/29
Levandowski	9/30
Gardner	9/29
Poetzcher	10/2
Burnette	10/2
Levandowski	10/2
Ron	10/2
Padilla	10/2
TK	10/2
Friedberg 2	10/2

David Perlson  
Quinn Emanuel Urquhart & Sullivan, LLP  
50 California Street, 22nd Floor  
San Francisco, CA 94111  
Direct: (415) 875-6344  
Main Phone: (415) 875-6600  
Main Fax: (415) 875-6700  
E-mail: [davidperlson@quinnemanuel.com](mailto:davidperlson@quinnemanuel.com)  
Web: [www.quinnemanuel.com](http://www.quinnemanuel.com)

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